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Counsel for Defendant
ANGEL RAMIREZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AUSENCIO ALVAREZ CORTEZ,
ANGEL ISMAEL RAMIREZ,

Defendants

Case No.: 2:20-CR-00229 DC

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE STATUS
CONFERENCE AND EXCLUDE
TIME UNDER THE SPEEDY TRIAL
ACT

It is hereby stipulated by and between counsel for the United States and counsel for the defendants Ausencio Cortez and Angel Ramirez that the status conference scheduled for December 19, 2025 be continued to February 20, 2026 at 9:30 a.m. It is further stipulated that time be excluded under the Speedy Trial Act through date.

This parties stipulate to the continuance for several reasons. Counsel for Defendant Ramirez will be out of the area and unavailable to appear in person on the currently set date. Moreover, the government recently produced additional discovery in the form of cell phone extractions, and counsel for both defendants need additional time to review that discovery and potentially have it analyzed by an expert. Finally, the parties also request the continuance to allow additional time for defense counsel to meet and confer with the defendants, resolve any outstanding discovery issues, conduct investigation, and discuss potential resolution.

For these reasons, the parties stipulate and agree that continuing the status appearance

and excluding time through February 20, 2026 is appropriate, and is necessary for the effective preparation and continuity of defense counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time through February 20, 2026 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

SO STIPULATED.

Eric Grant
United States Attorney

Dated: December 10, 2025

/s/ James Conolly
James Conolly
Assistant United States Attorney

Dated: December 10, 2025

/s/ Dina Santos
Dina Santos
Attorney for Ausencio Alvarez Cortez

Dated: December 10, 2025

/s/ Adam Pennella
Adam Pennella
Attorney for Angel Ismael Ramirez

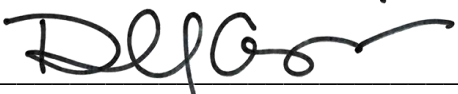
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ORDER

The court, having received, read and considered the parties' stipulation filed on December 10, 2025, and good cause appearing therefrom, APPROVES the parties' stipulation. Accordingly, the Status Conference scheduled for December 19, 2025, is VACATED and RESET for February 20, 2026 at 9:30 a.m. in Courtroom 10 before the Honorable Dena M. Coggins. The time period between December 19, 2025 and February 20, 2026, inclusive, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), and B(iv) [Local Code T4], as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: **December 12, 2025**



Dena Coggins
United States District Judge